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Amdt. dated February 2, 2006
Reply to Office Action of October 5, 2005

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REMARKS/ARGUMENTS

Claims 1-28 are pending in the application and claims 29-32 have been withdrawn from consideration as being drawn to a non-elected invention. In the Office Action, the Examiner rejected claims 1-7, 10-12, 15-27 under 35 U.S.C. §103(a) as allegedly being unpatentable over Kennedy et al. (US 20020111911, hereinafter "Kennedy"). The Examiner further rejected claims 8, 9, 13, 14, and 28 under 35 U.S.C. §103(a) as allegedly being unpatentable over Kennedy in view of US patent 6,205,481 to Heddaya et al. (hereinafter "Heddaya").

Independent claims 1, 10, 15, 24

Claim 1 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Kennedy. Claims 10, 15, and 24 are rejected on similar grounds. Applicants respectfully traverse the rejections.

As amended, claim 1 recites a method for distributing documents, comprising producing a first identifier including first information indicative of a first server, and transmitting the first identifier from the first server to a client based upon at least a request from the client to create the first document on the first server in an original document format, the client associating the first identifier with the first document. Claim 1 includes transmitting a copy of the first document in the original document format from the client to the first server. In response to a commit request transmitted to the first server, claim 1 includes the first server becoming responsive to download requests from one or more distribution servers for one or more copies of the first document, the download requests containing the first information.

Applicants respectfully submit that Kennedy does not teach or suggest all elements of amended claim 1. In particular, Kennedy does not appear to teach or suggest *"transmitting a copy of the first document in the original document format from the client to the first server,"* as recited in amended claim 1. In contrast, Kennedy provides a mechanism that routes a data file in a standard or predetermined file format (e.g., PDF) that is compatible with all document distribution services in the network. Kennedy states,

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[0035] When user 14 enters document distribution system 10, a distribution request 36 is submitted to document distribution system controller 26 [and] a *data file 38 for document 12 is uploaded* to document distribution system controller 26 via communication network 30. *[D]ocument distribution system controller 26...transfers data file 38 for document 12 to memory device 28* (FIG. 1) [and] *memory device 28 stores data file 38 for document 12 for subsequent retrieval and processing*, as described below. *Kennedy, page 3, emphasis added.*

[0036] *[D]ata file 38 for document 12 is converted into a standard or predetermined file format*...defined so as to be compatible with document distribution services 24 of document distribution providers 22. Thus, user 14 can consider all document distribution services 24 for document 12. *An example of a standard or predetermined file format includes a PDF (Portable Document Format) file format. Id., emphasis added.*

[0045] [U]ser 14 submits a distribution selection 54 for document 12 to document distribution system controller 26 via communication network 30. Distribution selection 54...identifies one or more distribution options 32 for document 12 [by which] *document distribution system controller 26 routes or distributes data file 38 for document 12 to one or more document distribution providers 22.* Document distribution system controller 26 routes data file 38 to document distribution providers 22 offering document distribution services 24 which fulfill distribution options 32 selected by user 14. In one exemplary embodiment, data file 38 is routed to document distribution providers 22 via communication network 30. *Kennedy, page 4, emphasis added.*

Therefore, Kennedy transmits the data file in a standardized file format (PDF) to allow otherwise incompatible network resources to operate on the standardized data file. For at least the reason that Kennedy does not teach or suggest "transmitting a copy of the first document in the original document format from the client to the first server," as recited in amended claim 1, Applicants submit that claim 1 is patentable over Kennedy.

Furthermore, Kennedy *teaches away* from transmitting a copy of the first document in the original document format, as recited in claim 1. Kennedy states that a user of a personal computer on a network has multiple services available for distributing a document from the computer, such as printing, sending the document electronically via e-mail, or publishing the document with print publishing services, but such services include limitations such that, "[t]o be

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able to utilize such services, however, the user must be aware of such services and, more importantly, a program or driver for each of the services must be installed on the computer," *page 1, paragraph [0002]*. Kennedy further states, "managing such services on a plurality of individual computers is a laborious task. Each service, for example, must be deployed, installed, configured, and maintained on each computer," *Id., paragraph [0003]*. Therefore, Kennedy implements a procedure whereby a standardized data file is created and routed on the network to prevent having to configure and manage a variety of services on each computer on the network.

With respect to claim 1, for at least the reasons that Kennedy does not teach or suggest transmitting the first document in an original document format, and that Kennedy teaches away from transmitting the first document in an original document format, Applicants submit that Kennedy does not make amended claim 1 obvious. Applicants therefore submit that amended claim 1 is in condition for allowance.

Furthermore, Applicants respectfully submit that, even if Kennedy were combined with Heddaya, the result would not result in amended claim 1 or otherwise make amended claim 1 obvious. Heddaya teaches a system to reduce load on a home server in which a document request follows through a computer network from a client to a particular document on the home server in the form of a routing graph or tree, with cache servers to service the document request by returning the cached document to the client. The system of Heddaya is designed to reduce the load on the home server in that a document request message is responded to by a cache server before the message ever reaches the home server. Therefore, the combination of Kennedy and Heddaya might provide that the standardized data file (e.g., PDF) of Kennedy could be cached at one or more cache servers to reduce load on the home server. As such, the combination of Kennedy and Heddaya would not result in the invention recited in amended claim 1, or otherwise make amended claim 1 obvious.

In addition, neither Kennedy or Heddaya or the combination teach or suggest "transmitting the first identifier from the first server to a client based upon at least a request from the client to create the first document on the first server in an original document format, the client associating the first identifier with the first document," as recited in amended claim 1. For

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at least this reason, among others, Applicants submit that amended claim 1 is in condition for allowance.

Because independent claims 10, 15, and 24 were rejected upon similar grounds to claim 1 and include similar limitations as amended claim 1, Applicants submit that amended claims 10 15, and 24 are also in condition for allowance.

Dependent Claims

Applicants submit that claims 2-9, which depend either directly or indirectly from claim 1, should be allowed for at least a similar rationale as discussed above, and others. Furthermore, many of the dependent claims recite additional features that, contrary to that stated in the Office Action, are not taught or suggested by the cited references, thus making the claims patentable for additional reasons. For example, claim 9 includes "receiving at the first server a second document from the second server, the second document representative of a modified version of the first document, the first server storing the second document while retaining the first document, the first server distributing the document to other servers." The cited art does not teach or suggest this element.

Claims 11-14, which depend either directly or indirectly from claim 10, claims 16-23, which depend either directly or indirectly from claim 15, and claims 25-28, which depend either directly or indirectly from claim 24, should also be allowed for at least a similar rationale as discussed above, and others.
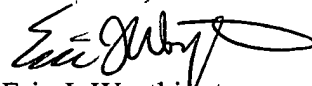
CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

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If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

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